

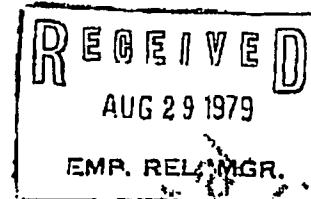
United Steelworkers of America

AFL-CIO

FIVE GATEWAY CENTER PITTSBURGH, PA. 15222

July 25, 1979

Mr. Bruce L. Webb
 Manager of Employee Relations
 Eaton Corporation
 Brake Division
 Gallatin Plant
 P. O. Box 761
 Gallatin, TN 37068



Dear Mr. Webb:

We are writing in regard to our July 11 tour and meeting at Eaton's Gallatin plant.

First, we appreciate all the company has done since Director Thrasher's visit. Eaton seems well on the way to minimizing the asbestos problem. From your sampling results, it would appear that the grinding operation is in compliance with TOSHA standards. However, you will recall that those standards are based on feasibility considerations for the entire asbestos industry. As you know, there is no safe level for a carcinogen, although the lower the level, the lower the risk. Even at levels as low as 0.2 fibers/cc -- 1/10 of the current standard -- the average worker would inhale about a million asbestos fibers in the course of a workday. Every effort should be made to minimize this exposure. We understand the company is investigating the possibility of eliminating the pad-grinding operation altogether. We would appreciate continuing reports on your program at the regular meetings of the Safety and Health Committee. Until then, the company should investigate the possibility of extra hooding around the No. 1 and No. 2 grinders, in order to minimize the openings and thereby increase the efficiency of the local exhaust system.

The asbestos collector outside the building appears to be a bigger problem. It is likely that the company is not in compliance with TOSHA standards in this area. For example, there are piles of asbestos dust on the ground near the collector. The gravel bed makes it almost impossible to pick up all the asbestos, since some of it falls between the gravel, only to be blown

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around when the wind shifts. We understand that the company is designing a new collector system. We would appreciate a full report on this system at the next meeting of the Safety and Health Committee. At the very least, the company should immediately issue written standard operating procedures for minimizing and cleaning up spills, and should begin the construction of a sealed concrete pad to replace the gravel.

As you know, TOSHA standards require the company to develop a written respirator program. We would appreciate a copy of the program at the next meeting of the Safety and Health Committee. We would also appreciate it if you would provide the Union members of the Safety and Health Committee with copies of the company's sampling reports. As you know, this is required by the Asbestos Standard.

During the walkaround, we identified several other potential hazards:

1. The operator of the centerless grinder is exposed to an excessive amount of oil mist. Extra shrouding should be installed as soon as possible.

2. TOSHA sampling results for carbon monoxide indicate that levels are below current legal standards, but slightly above the levels recommended by the National Institute for Occupational Safety and Health. We understand the company intends to replace the gasoline-powered forklifts with propane or electric forklifts. To the greatest extent feasible, the new forklifts should be electric, since even propane-powered engines can give off carbon monoxide. We would hope this replacement could be complete as soon as possible, and would appreciate a report at the next meeting of the Safety and Health Committee.

3. As you know, Eaton has been cited by TOSHA for excessive noise. The company has already been given five extensions of time in order to complete the abatement. The current deadline is August. We would appreciate it if you could indicate whether the company considers the hazard to be abated, and if not, what the company intends to do.

4. Several workers complained about an unventilated cut-off saw near the welding area. There is a great deal of dust around the saw. While the saw is not used for cutting asbestos, it would

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appear that dust levels are very high when it is used. A local exhaust ventilation system should be attached to the saw as soon as possible.

5. It would appear that the fresh-air inlets on the roof may be too close to the outlets in the ventilation system. We would appreciate it if the company would study the situation and report to the Safety and Health Committee by the September meeting.

Finally, there is a more general problem. A number of solvents, lubricants, cutting oils and other materials are used in the plant. Most of these are labeled only with the trade name. We assume the company has material safety data sheets for these products, including a list of ingredients, information on the hazards of the material, and recommended procedures for safe handling. We would appreciate it if you would make these safety data sheets available to the Local Union. If necessary, they will pass them on to the USWA Safety and Health Department in Pittsburgh. Where the company does not have a material safety data sheet for a particular product, you should make every effort to obtain one or to use an alternative product for which adequate information is available.

Thank you again for your courtesy and cooperation, and for the efforts Eaton is making to eliminate hazards in the Gallatin plant. We look forward to working with you in the future.

Sincerely yours,

Michael J. Wright
Industrial Hygienist
Safety and Health Department

Ken Mingle
Staff Representative

David Crenshaw
David Crenshaw
President, Local Union 5034

MJW/

Bruce Thrasher
Adolph E. Schwartz
Herbert Johnson

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